

# EXHIBIT M

## Keith Flynn

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**From:** Keith Flynn  
**Sent:** Friday, March 27, 2015 1:36 PM  
**To:** 'Miglio, Terrence J.'  
**Subject:** RE: Reeser  
**Attachments:** STIPULATED ORDER RE HOOD (2d).docx

Terrence:

I have not heard anything back from you regarding this issue. While I do not understand the distinction raised in your email, I am willing to alter the language of the stipulated order to reflect that it is an agreement to take and use Ms. Hood's deposition after the discovery cutoff and pursuant to the court rules.

Once again, the discovery cutoff is looming. If we do not resolve this matter by the end of the day, I will be tempted to file a motion to preserve my client's rights.

Please review and state whether you consent to the language in the stip and order.

Thanks.

- Keith

**From:** Keith Flynn  
**Sent:** Friday, March 27, 2015 10:34 AM  
**To:** 'Miglio, Terrence J.'  
**Subject:** RE: Reeser

The stipulated order that I sent you yesterday only extends discovery for the purpose of taking Ms. Hood's deposition. Could you clarify the distinction that you are making in regards to just agreeing to take her deposition after discovery as opposed to what is in the stipulated order?

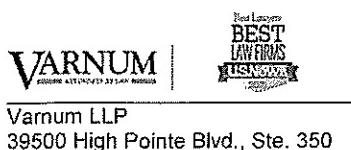
Thanks.

- Keith

**From:** Miglio, Terrence J. [mailto:[tjmiglio@varnumlaw.com](mailto:tjmiglio@varnumlaw.com)]  
**Sent:** Friday, March 27, 2015 10:11 AM  
**To:** Keith Flynn  
**Subject:** RE: Reeser

If we are going to extend discovery and not just agree to take her deposition after discovery, then we need to extend the dispositive motion cutoff date.

**Terrence J. Miglio, Esq.**  
Direct: (248) 567-7828  
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**From:** Keith Flynn [mailto:[kflynn@millercohen.com](mailto:kflynn@millercohen.com)]  
**Sent:** Thursday, March 26, 2015 11:56 AM  
**To:** Miglio, Terrence J.  
**Cc:** Buchanan, Barbara E.  
**Subject:** RE: Reeser

Terrence:

I have attached the draft stipulated order regarding Ms. Hood's deposition. Please state whether you concur and provide me with authority to sign on your behalf.

Thank you.

- Keith

**From:** Keith Flynn  
**Sent:** Thursday, March 26, 2015 11:22 AM  
**To:** 'Miglio, Terrence J.'  
**Cc:** 'bebuchanan@varnumlaw.com'  
**Subject:** RE: Reeser

I just spoke with your paralegal, Joanne, regarding the matter discussed below. She indicated that the deposition of Ms. Hood is not going tomorrow. She told me that you were going to get additional dates of availability and that you were agreeable to a stipulated order extending discovery for the sole purpose of taking Ms. Hood's deposition.

I will forward the draft stipulated order to you later today.

Also, I have not heard back regarding the stipulated protective order. Obviously, the discovery cutoff is soon approaching. I will need a decision on that issue sooner rather than later.

- Keith

**From:** Keith Flynn  
**Sent:** Thursday, March 26, 2015 9:55 AM  
**To:** 'Miglio, Terrence J.'

**Cc:** 'bebuchanan@varnumlaw.com'

**Subject:** RE: Reeser

Terrence:

I have a court reporter waiting on standby. I would like to accommodate Ms. Hood's schedule as much as possible and I certainly hope to provide the court reporter with notice of this change as soon as possible. However, I cannot reschedule Ms. Hood's deposition without your confirmation that I will be able to depose Ms. Hood on another mutually convenient date without running afoul of the Court's Scheduling Order. I need an answer as soon as possible regarding Ms. Hood's availability or Defendant's willingness to sign a stipulated order today extending the discovery period for the sole purpose of taking Ms. Hood's deposition.

If I do not hear back from you by 2pm, I cannot reschedule the deposition. I will continue under the assumption that Ms. Hood will appear for the full-day deposition scheduled for tomorrow that I requested over a month ago.

Please advise.

Thanks.

- Keith

**From:** Miglio, Terrence J. [mailto:[tjmiglio@varnumlaw.com](mailto:tjmiglio@varnumlaw.com)]

**Sent:** Wednesday, March 25, 2015 12:23 PM

**To:** Keith Flynn

**Subject:** RE: Reeser

I will check with her for her availability.

**Terrence J. Miglio, Esq.**

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**From:** Keith Flynn [mailto:[kflynn@millercohen.com](mailto:kflynn@millercohen.com)]

**Sent:** Wednesday, March 25, 2015 12:21 PM

**To:** Miglio, Terrence J.  
**Subject:** RE: Reeser

My schedule is incredibly busy in the next couple of weeks—I have an arbitration hearing coming up the first week of April. The only day that I am available next week without rescheduling other meetings is Monday. However, I am definitely going to need a full day with Ms. Hood. Please let me know if Monday works.

Thanks.

- Keith

**From:** Miglio, Terrence J. [<mailto:tjmiglio@varnumlaw.com>]

**Sent:** Wednesday, March 25, 2015 10:21 AM

**To:** Keith Flynn

**Subject:** Reeser

Jill Hood informs me that she is only available Friday morning. She said she can start early on that day. I am trying to reach her to see her actual availability that day. If Friday morning starting early won't provide you with enough time I will get alternate dates from her but it would be easier if you let me know your availability.

**Terrence J. Miglio, Esq.**

Direct: (248) 567-7828

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**NATALIE REESER,**

Plaintiff,

v.

Case No.: 2:14-cv-11916-GCS-MJH

Hon. George Caram Steeh  
Magistrate Judge Michael Hluchaniuk

**HENRY FORD HOSPITAL,**

Defendant.

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**MILLER COHEN, P.L.C.**

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**VARNUM LLP**

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**STIPULATED ORDER TO TAKE DISCOVERY DEPOSITION  
AFTER THE DISCOVERY CUTOFF**

Plaintiff Natalie Reeser and Defendant Henry Ford Hospital stipulate as follows:

Currently, the deadline for discovery is April 6, 2015 pursuant to Dkt. No. 22. Plaintiff noticed and subpoenaed Jill Hood to appear for her deposition on March 23, 2015. This date was re-noticed for March 27<sup>th</sup> pursuant to an agreement

between the attorneys to instead depose Ms. Reeser on March 23<sup>rd</sup>. Ms. Hood's deposition must be rescheduled because she is no longer available on March 27<sup>th</sup>.

Consequently, the parties stipulate that Ms. Hood's discovery deposition will take place on May 5, 2015 at 10am at the office of Miller Cohen PLC and that Ms. Hood's deposition shall be governed by and used for all purposes allowed under the Federal Rules of Civil Procedure.

**IT IS SO ORDERED** that Ms. Hood's discovery deposition will take place on May 5, 2015 at 10am at the office of Miller Cohen PLC and that Ms. Hood's deposition shall be governed by and used for all purposes allowed under the Federal Rules of Civil Procedure.

Dated: \_\_\_\_\_

HON GEORGE CARAM STEEH

**STIPULATED AS TO FORM AND SUBSTANCE:**

**MILLER COHEN P.L.C.**

By: /s/Keith D. Flynn  
Keith D. Flynn (P-74192)

**VARNUM LLP**

By: /s/Terrence J. Miglio (w/consent)  
Terrence J. Miglio (P-30541)